

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR LLC,

Defendants.

Civil Action No. 2:24-cv-00228-JRG-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC, Defendants herein, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer, or otherwise respond to Plaintiff's Complaint. In support of their Motion, Defendants state as follows:

1. On April 3, 2024, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC.

2. On April 4, 2024, Defendants Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC were served with Plaintiff's Complaint. Samsung Electronics America, Inc., and Samsung Electronics Company, Ltd. have not yet been served.

3. Counsel for Defendants has agreed to waive service under the Hague Convention for Samsung Electronics America, Inc. and Samsung Electronics Company, Ltd., a foreign entity,

in exchange for a 90-day extension of time for all defendants to answer or otherwise plead by July 24, 2024.

4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC, respectfully request that the time in which they are required to move, answer, or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended up to and including July 24, 2024.

Dated: April 24, 2024

Respectfully submitted,

/s/ Melissa R. Smith

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***Attorney for Defendants
Samsung Electronics Co., Ltd., Samsung
Electronics America, Inc., Samsung
Semiconductor, Inc., and Samsung Austin
Semiconductor LLC***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 24th day of April, 2024.

/s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Melissa R. Smith
Melissa R. Smith